REMARKS

Examiner Interview

On March 6, 2009, Applicants' representative, Elizabeth Ruzich, conducted an Examiner Interview with Examiner Spooner. During the interview, the parties discussed a proposed claim amendment for claim 1 to overcome the rejections under 35 USC 112. The parties came to an agreement on the specific language to be used in the amended claims and the amended claims submitted herewith contain the language as accepted by the Examiner. Applicants thank the Examiner for his careful analysis of the claims and willingness to discuss them in such detail.

35 USC 112

Claims 1, 4-16, 19-31, 34, 45, and 48 are rejected under 35 USC 112 for being indefinite. These claims are also rejected under 35 USC 112 for failing to comply with the written description requirement.

Applicants amend the claims to more clearly recite the invention. Support for these amendments can be found throughout the specification. For the Examiner's convenience, Applicants explain where there is support in the specification for each feature recited in claim 1. Because the amendment to claim 1 is substantially similar to the amendments made to independent claims 9, 15, 16, 24, and 30, this explanation applies to all independent claims.

Claim 1 recites a computer-implemented process for reordering items in a database to be retrieved for display to a user. While the term "computer-implemented" is not present in the application, Applicants direct the Examiner to Figure 1, which illustrates a device

that stores a computer-implemented process for reordering items in a database for display to a user. In addition, page 8, lines 22-25 describe the invention as a text processor that gathers each key press and performs predictive word processing. A person of ordinary skill in the art would recognize that the processor referred to on page 8 performs a computer-implemented process. As a result, this amendment does not constitute new matter.

The words are stored in a linguistic database (LDB). The words are ordered according to a predefined linguistics frequency of use model. See, for example, page 3 lines 13-14 of the specification. A processor accepts user input from a keyboard, where the user input comprises at least one keypress. See, for example, page 3 lines 8-10 and page 8, lines 22 and 27-29 of the specification. Any words that match at least one letter corresponding to at least one keypress are retrieved from the LDB. See, for example, page 8 lines 27-29 of the specification. The words are displayed as ordered in the LDB.

User-defined words are accepted as input by the user and stored in the user database (UDB). See, for example, page 10 line 6 of the specification. All user-defined words are assigned a frequency count, which is also stored in the UDB. See, for example, page 11 lines 8-10 of the specification.

A user can select a word from the displayed list. When the user selects a word in a non first order position, the word is assigned a frequency count and stored in the UDB in association with the word. See, for example, page 7, lines 10-12 of the specification. The first order non selected word is also assigned a frequency count that is stored in the UDB in association with the word. See, for example, page 7, lines 11-13. The frequency count for the non first order selected word is different than the frequency

count for the first order non selected word. See, for example, page 7, lines 13-21 of the specification.

Subsequent user input is accepted from a keyboard, the user input comprising at least one keypress. Any words from the LDB and any user-defined words from the UDB that match at least one letter corresponding to the at least one keypress are retrieved. See, for example, page 15, lines 5-14. If more than one word from any of the LDB and the UDB is retrieved, and at least one word is associated with a frequency count, the words are dynamically reordered for display as a function of the predefined linguistics frequency of use model and the frequency count associated with any of the retrieved words. See, for example, page 7, line 19 – page 8, line 8. The reordered matching words are displayed.

The frequency count associated with a word is updated each time a non first order word is selected from a displayed list of matching words. See, for example, page 7, line 23 of the specification. As a result of updating the frequency count, frequently selected words are eventually listed before the words ordered according to a predefined linguistics frequency of use model.

Conclusion

Applicants respectfully posit that all rejections of the claims have been overcome. Accordingly, Applicants respectfully request allowance of all claims. The Examiner is invited to please contact Applicants' attorney at (650) 474-8400 should any questions arise.

Respectfully submitted,

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